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June 9, 2022

**BY ECF:**

Hon. Colleen McMahon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: United States v. Amir Bruno Elmaani  
Case No.: 1:20-cr-00661-1 (CM)  
First Request for Modification of Release Conditions

Dear Judge McMahon:

Please be advised that Spodek Law Group P.C. represents **Amir Bruno Elmaani**, the Defendant in the above-referenced matter. Mr. Elmaani respectfully requests a modification of his release conditions to remove home detention and location monitoring.

On March 18, 2021, Your Honor granted a joint proposal of Mr. Elmaani's release conditions:

- A personal recognizance bond of \$1,000,000, to be cosigned by two financially responsible persons, and to be secured by the following property: (i) 1792 Needy Road, Martinsburg, West Virginia (the "West Virginia Home"), and (ii) 336 Switch Road, Hope Valley, Rhode Island (the "Rhode Island Home");
- Pretrial Services supervision as directed;
- Home detention with location monitoring, at the West Virginia Home;
- Inspection and approval of the West Virginia Home by Pretrial Services, before the defendant's release;
- Surrender all travel documents and make no new applications;
- Attend mental health treatment as directed by Pretrial Services;
- Refrain from possession of a firearm, destructive device or other dangerous weapon;
- Surrender all firearms and permits and provide written verification of the same to Pretrial Services;
- Refrain from soliciting or engaging in investment, purchase, or exchange of

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cryptocurrencies or tokens; and

- Travel restricted to the Southern and Eastern Districts of New York and the Northern District of West Virginia, as well as the Districts necessary to travel in between those Districts.

(ECF No.: 9).

Pretrial Services advises that Mr. Elmaani, who is being supervised in the Northern District of West Virginia, has been in compliance with all release conditions since his release in March of 2021. Pretrial's initial recommendation, in this case, did not include any form of location monitoring.

I have conferenced the case with Pretrial Officer Joshua Rothman who consents to a modification from home detention to a curfew, or to remove the location monitoring conditions altogether.

I also conferenced Mr. Elmaani's request with AUSA Margaret Graham and the Government defers to the recommendation of Pretrial Services.

Thank you for your consideration.

Sincerely,

**Spodek Law Group P.C.**  
/S/ Todd A. Spodek

TS/az

cc: All Counsel (By ECF).